

1. The defendant is charged with an offense, distribution of cocaine base and fentanyl, for which a maximum term of imprisonment of not more than twenty years is prescribed in Title 21, United States Code, Sections 841(a)(1). Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

2. The offense involved the distribution of crack cocaine and fentanyl which led to several overdoses with at least one overdose resulting in serious bodily injury and another overdose resulting in death.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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